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Attorneys for Plaintiffs,

OWEN DIAZ

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

DEMETRIC DI-AZ, OWEN DIAZ, and
LAMAR PATTERSON,

Plaintiffs,

v.

TESLA, INC. dba TESLA MOTORS, INC.;
CITISTAFF SOLUTIONS, INC.; WEST
VALLEY STAFFING GROUP;
CHARTWELL STAFFING SERVICES, INC.;
and DOES 1-50, inclusive,

Defendants.

Case No. 3:17-cv-06748-WHO


**PLAINTIFF'S REPLY TO DEFENDANT
TESLA, INC.'S OBJECTION TO
PROPOSED VERDICT FORM**

Trial Date: September 27, 2020

Complaint filed: October 16, 2017

1 Plaintiff has no substantive objections to Defendant's proposed alteration to Question 4
2 of the Proposed Verdict Form. (Dkt. No. 283) However, to avoid confusion and safeguard
3 against an inconsistent verdict or confusion among jurors, Plaintiff respectfully requests
4 Question 4 on the Proposed Verdict Form be accompanied by the following instruction: "*If you*
5 *answered "No" to questions 3A, 3B, and 4, skip question 5 and go to question 6.*"

6
7 Dated: October 2, 2021



8 J. Bernard Alexander
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10 Navruz Avloni
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12 Attorneys for Plaintiff
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